

LEDERMAN ABRAHAMS & LEDERMAN, LLP
Attorneys for the
JOREMI ENTERPRISES, INC.,
ZEV COHEN & ASSOCIATES, INC., QUALIFIED
RETIREMENT PLAN,
COHEN PROPERTIES OF CENTRAL FLORIDA, LTD.
ZEV COHEN AND GAIL COHEN, TENANTS
BY THE ENTIRETY,
567 Broadway
Massapequa, NY 11758
Tele: (516) 541-8900
Fax: (516) 541-9232
E-Mail: Ledermanb@Verizon.Net

Bruce H. Lederman (BL- 5758)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

NEW 118TH LLC, et al.,
-----X

Chapter 11
Case No. 07-12333(SMB)
Jointly Administered

JOREMI ENTERPRISES, INC.,
ZEV COHEN & ASSOCIATES, INC., QUALIFIED
RETIREMENT PLAN,
COHEN PROPERTIES OF CENTRAL FLORIDA, LTD.
ZEV COHEN AND GAIL COHEN, TENANTS
BY THE ENTIRETY,
INDIVIDUALLY AND ON BEHALF OF ALL THOSE
INVESTORS IN MORTGAGES ORIGINATED
BY THE KINGSLAND GROUP, INC., ON
16 PROPERTIES IN MANHATTAN,

Plaintiff(s),

-against-

NEW 118TH, LLC, HWJ 152 CORP., KG 179 CORP.
KG AUDUBON INC., MDI 176 CORP.
72 PINEHURST CORP., MDI 168 CORP.,
MDI 507/559 LLC, KGP 180 LLC,

MDI 234-236 LLC, MIDD 159TH LLC.,
KG 184TH LLC, MDI 190 LLC, MDI 188 LLC,
MDI 515 LLC, KGP 520 LLC,
North Fork Bank, Washington
Mutual Bank, Dominion Financial Corp.,
Israel Discount Bank,
Interwest Mortgage Corporation,
Interwest National Bank
THE CITY OF NEW YORK, THE STATE OF NEW YORK,
MICHAEL HERSHKOWITZ,
IVY TURK a/k/a IVY WOOLF-TURK.,
ROBERT LOBEL., THE KINGSLAND GROUP, INC.,
And JOHN DOES 1 THROUGH JOHN DOES 50,
said names being fictitious and intended to designate
those persons or unknown persons or entities who :
have claims under the Real Property being foreclosed
herein,

-----X

NOTICE OF REMOVAL

**TO THE HONORABLE DISTRICT COURT JUDGE
ASSIGNED TO THIS PROCEEDING:**

JOREMI ENTERPRISES, INC., ZEV COHEN & ASSOCIATES, INC., QUALIFIED
RETIREMENT PLAN, COHEN PROPERTIES OF CENTRAL FLORIDA, LTD.
ZEV COHEN AND GAIL COHEN, TENANTS BY THE ENTIRETY, plaintiffs in the above-
captioned action (the "Plaintiffs"), by their attorneys LEDERMAN ABRAHAMS &
LEDERMAN, LLP, respectfully provides notice to this Court of removal of the above-captioned
civil action from the Supreme Court of the State of New York, County of New York, to the
United States District Court for the Southern District of New York, and respectfully represents as
follows:

1. On or about May 21, 2007, the Plaintiffs filed a Summons and
Complaint (collectively, the "State Court Action") against NEW 118TH, LLC, HWJ 152

CORP., KG 179 CORP. KG AUDUBON INC., MDI 176 CORP., 72 PINEHURST CORP., MDI 168 CORP., MDI 507/559 LLC, KGP 180 LLC, MDI 234-236 LLC, MIDD 159TH LLC., KG 184TH LLC, MDI 190 LLC, MDI 188 LLC, MDI 515 LLC, KGP 520 LLC, North Fork Bank, Washington Mutual Bank, Dominion Financial Corp., Israel Discount Bank, Intervest Mortgage Corporation, Intervest National Bank THE CITY OF NEW YORK, THE STATE OF NEW YORK, MICHAEL HERSHKOWITZ, IVY TURK a/k/a IVY WOLF-TURK., ROBERT LOBEL, THE KINGSLAND GROUP, INC. in Supreme Court of the State of New York, County of New York (the "State Court"), a copy of which is attached hereto as Exhibit "A".

2. The State Court Action has been assigned Index Number 07/107168 in the State Court, and the case is presently assigned to Hon. Edward Lehner.
3. As of the date hereof, no answer has been served by any defendant in the State Supreme Court Action.
4. On July 30, 2007 (the "First Filing Date") involuntary petitions under Chapter 11 of Title 11, United States Code (the "Bankruptcy Code") were filed against state State Court Defendants NEW 118TH, LLC, HWJ 152 CORP., KG 179 CORP., KG AUDUBON INC., MDI 176 CORP., 72 PINEHURST CORP., MDI 168 CORP., MDI 507/559 LLC, KGP 180 LLC, MDI 234-236 LLC, MIDD 159TH LLC., KG 184TH LLC, MDI 190 LLC, MDI 188 LLC, MDI 515 LLC, and KGP 520 LLC. Orders for relief pursuant to section 303 of the Bankruptcy Code were entered against each of the foregoing defendants on August 27, 2007.

5. On August 20, 2007 (the "Second Filing Date"), an involuntary petition under Chapter 11 of the Bankruptcy Code was filed against state Court defendant The Kingsland Group, Inc. pursuant to Chapter 11 of the Bankruptcy Code (the "Code"), case number 07-12642(SMB). An order for relief under section 303 of the Bankruptcy Code was entered against The Kingsland Group, Inc. on September 20, 2007.
6. The Chapter 11 cases of the foregoing State Court Defendants, are now being jointly administered under the Chapter 11 case of In re New 118th LLC, Case No. 07-12333, pending in the United States Bankruptcy Court for the Southern District of New York.
7. The aforesaid bankruptcy cases are all being jointly administered a before Hon. Stuart M. Bernstein, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the Southern District of New York, under Case No. 07-12333 (SMB). As a result of the foregoing bankruptcy filings, the proceedings in the State Court Action are stayed by against the following defendants: NEW 118TH, LLC, HWJ 152 CORP., KG 179 CORP., KG AUDUBON INC., MDI 176 CORP., 72 PINEHURST CORP., MDI 168 CORP., MDI 507/559 LLC, KGP 180 LLC, MDI 234-236 LLC, MIDD 159TH LLC., KG 184TH LLC, MDI 190 LLC, MDI 188 LLC, MDI 515 LLC, KGP 520 LLC, and THE KINGSLAND GROUP, INC, as well as the City of New York, and the following banks which were named solely as mortgage holders on properties owned by the aforesaid defendants for which mortgages were sought to be foreclosed: North Fork Bank, Washington Mutual Bank, Dominion Financial Corp., Israel Discount Bank, Intervest Mortgage Corporation, and Intervest National Bank.

8. The only defendants in the State Court Action as against which the action is not now stayed by the filing of bankruptcy petitions are defendants Michael Hershkowitz, Ivy Turk a/k/a Ivy Woolf-Turk and Robert Lobel and the time of the said defendants to answer the complaint has been extended until October 18, 2007.
9. The claims and causes of actions underlying the State Court Action are "core proceedings" within the meaning of, inter alia, 28 U.S.C §157(b)(2)(A), (B), , (K) and (O) in that the State Court Action concerns, inter alia, (i) matters concerning the administration of the Debtors' estates; (ii) allowance or disallowance of claims against the estate; (iii) determinations of the validity, extent, or priority of liens; and (iv) other matters pertaining to the liquidation of the assets of the estate and the adjustment of the debtor-creditor relationship. In addition, the claims by the Plaintiffs against the Individual Defendants will affect the Debtors' estates because any proceeds of such claims will be delivered to the Bankruptcy Trustee also the extent of claims under the guarantees at issue in the State Court Action may be affected by disposition of property of the estate.
10. This Notice of Removal is being timely filed pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure.
11. Pursuant to 28 U.S.C. Section 1334(d) and the permanent order of reference of the United States District Court for the Southern District of New York issued pursuant to 28 U.S.C. §157 (Ward, C.J.), the Bankruptcy Court has jurisdiction over, inter alia, the allowance and disallowance of claims against the Estate. Consequently, the

above-captioned Civil Action, which involves, inter alia, the allowance of claims against the estate, the proper administration of the Debtor's bankruptcy estate, and the disposition of property of the Debtor, should be decided by the Honorable Bankruptcy Judge assigned to the bankruptcy proceeding. Therefore, upon removal, the Plaintiffs will seek to have this Civil Action referred to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, assigned to the bankruptcy case for administration.

12. The Civil Action is an action over which this Court has original jurisdiction under the provisions of 28 U.S.C. Section 1334, and is one which may be removed to this Court by the Debtor pursuant to the provisions of 28 U.S.C. Section 1452, in that the matter in controversy is a civil action related to a bankruptcy case.

Dated: Massapequa, New York
October 4, 2007

LEDERMAN ABRAHAM & LEDERMAN, LLP
Attorneys for the State Court Plaintiffs
JOREMI ENTERPRISES, INC.,
ZEV COHEN & ASSOCIATES, INC., QUALIFIED
RETIREMENT PLAN,
COHEN PROPERTIES OF CENTRAL FLORIDA, LTD.
ZEV COHEN AND GAIL COHEN, TENANTS
BY THE ENTIRETY
567 Broadway
Massapequa, NY 11758
Tele: (516) 541-8900
Fax: (516) 541-9232
E-mail: Blederman@Verizon.Net

By: 

Bruce H. Lederman (BL-5758)